



December 22, 2010

Mr. Joe Yun
California Department of Water Resources
Division of Integrated Regional Water Management
P.O. Box 942836
Sacramento, CA 94236

Subject: Yuba Region Planning Grant Evaluation

Dear Mr. Yun:

Thank you for your consideration of the Yuba Region IRWMP Update Planning Grant Application dated September 2010 and submitted under the IRWM Grant Program – Planning Grant, Round 1, FY 2010-2011. We have reviewed the proposal evaluation and find that we disagree with some of the comments. The attached document provides our responses in the context of the proposal evaluation. We provide them in hope of improving the score of our Round 1 application and to better understand the scoring process so as to be more competitive in Round 2.

Please let me know if you have any questions or need further information

Sincerely yours,

A handwritten signature in blue ink that reads "Scott Matyac".

Scott Matyac
Water Resources Manager

[COMMENTS TO THE EVALUATION ARE PROVIDED IN *BLUE ITALICIZED* TEXT]

Project Description -The Plan update will continue to work with the local agencies to identify projects to address the needs of the DACs. Additional support has been allocated to support the development of projects serving DAC's so sufficient information is available to describe the project, and find ways to integrate the project into larger programs.

One of the roles of the Project Integration Subcommittee (described in the application) is to look for opportunities to combine individual projects (including DAC projects) into larger programs that meet multiple objectives.

Key water management issues for this region includes: flood management issues, water supply reliability, ecosystem preservation and enhancement, and water quality.

Evaluation Summary Scoring Criterion	Score
Work Plan	9
DAC Involvement	8
Schedule	6
Budget	8
Program Preferences	3
Geographic Balance	0
Total Score 34	

Work Plan - Overall, the work plan identifies a broad range of important principles for developing an IRWM Plan, but discusses few specifics and tasks are vaguely described.

- No actual projects are described.

Section 6.1.1 History- states that 67 projects were identified in the 2008 Plan, and that since the Plan Area was modified as part of the RAP process, eight projects were removed from the original list. Additionally, almost 20 new projects have been added to the project list for inclusion in the Plan Update.

The following tasks were identified to review and update the project list of the Region as part of the Plan Update following the re-evaluation of the Plan objectives and strategies:

- *Task 4.3 – Review and Update Project Review Process*
- *Task 4.5 – Update Resource Management Strategies and Projects Addressing Them*
- *Task 4.6 – Review and Update Projects to Address Strategies*
- *Task 4.7 – Project Support for DACs*
- *Task 4.8 – Project Feasibility and Other Factors Review*
- *Task 4.10 Project Integration Review*

This approach is intended to focus more on the re-evaluation of the projects (with added support for DACs) and establishing a more substantial integration of the existing and new projects than the identification of individual projects for inclusion in this planning grant application.

- The application does not propose a mechanism for supporting stakeholders that lack statutory authority or staff to participate in governance or decision-making.

The purpose of Task 3 is to work with all the entities, agencies, and stakeholder groups to develop a more formal governance structure that addresses the needs of IRWMP Program. Task 2.2 identified the current list of stakeholders in the Region and potential new stakeholders that the RWMG would be contacted in writing to be made aware the IRWM.

- The work plan does not present sufficient, concrete organizational or technical detail to provide a clear path forward to update or complete a standards-compliant IRWM Plan.

The work plan was developed for the update of the plan, in part by addressing several key areas that would were identified in the RAP. The work plan was intended to work with the RWMG members and stakeholders to develop the details to be included in the Plan Update, recognizing that they are not completed at this time. It appears that there is the expectation that some of the items to be included in the workplan are already completed.

- Also, the work plan fails to identify metrics or a clear plan for monitoring or evaluating plan performance.

Task 4.19 identifies that the monitoring plan will be developed, but does not state how the metrics identified would be used to evaluate plan performance.

DAC Involvement - The work plan identifies eight specific communities and areas that are classified as disadvantaged.

- The work plan provides a reasonably well-defined description of how DACs will be involved in the IRWM process.
- The stakeholder outreach process includes a comprehensive effort to activate and engage stakeholders, including DACs, tribal communities and other underrepresented groups, in the IRWM planning process.
- However, based on the description of Task 4.7 Project Support for DACs, it appears that the RWMG will not work directly with the DACs.

This statement appears to somewhat contradict the two previous statements stating that the DAC outreach process appears to be comprehensive. As described in Section 6.4.14, many of the DAC's are widely disbursed throughout the valley floor of the region. Many of the communities including the City of Marysville, Wheatland, Linda County Water District, and Olivehurst PUD represent these areas and participated in the development of 2008 Plan and will participate in the Plan Update.

Schedule - Schedule is consistent with the work plan and budget. However, the schedule lacks detail and provides no supporting documentation.

- It does not indicate the sequence of work tasks (other than the production of reports), milestones, or the actual timeframe of work being done.

The schedule does not show the breakout for all of the subtasks of Task 4.

- Given the status of stakeholder involvement and the lack of detail for the work tasks, a 12-month schedule for completion appears to be insufficient to complete a standards-compliant IRWM Plan.

Prior to the start of the IRWM Process, the entities of the region had worked together to complete numerous projects and programs of regional significance which address several of the most important issues facing the region. These projects include:

- *Lower Yuba River Accord (water supply reliability, instream flows, conjunctive use)*
- *Yuba-Feather Supplemental Flood Control Program (flood protection)*
- *Groundwater Management Plan (groundwater management, conjunctive use)*
- *Three Rivers Levee Improvement Authority (flood protection) Yuba County IRWMP (integrated water management)*

These efforts could not have been completed without a high level of regional cooperation and support.

The Region has also spent over three years preparing and adopting the initial Yuba County IRWMP and having the Region being selected through the Region Acceptance Process. Because of all these existing efforts, the update of the Plan was intended to focus on the few remaining issues that we more fully develop the Plan, rather than take a longer time and spend more money to develop a new plan.

Budget - Budget is consistent with the work plan and the schedule; however, given the lack of specific detail on the work to be performed, it is difficult to determine if costs are reasonable.

- Additionally, direct costs for Tasks 4 through 7, which include the production of the draft and final reports, are estimated to be zero and do not appear to be reasonable.

No additional direct costs were added to Tasks 4 to 7 by design.

- *All the meetings and stakeholder involvement for the update of the Plan are included in Task 2.*
- *Distribution of draft materials and communications would be handled through the updated IRWM website identified in Task 1.3.*
- *Production of copies of reports typically does not require a separate charge as they are part of the work effort. Consultants frequently include these costs in their hourly rate.*

Program Preference - The proposal mentions 11 Program Preferences; however, only three program preferences are adequately addressed. They are: regional programs or projects, effectively integrate water management with land use planning, and climate change.

Numerous of the Program Preferences were addressed in the 2008 Plan, and several of them have already been implemented in the region (as described in the Region History), including:

- *Effectively Resolve Significant Water Related conflicts with or Between Regions:*
 - *Lower Yuba River Accord (water supply reliability, instream flows, conjunctive use)*
 - *Yuba-Feather Supplemental Flood Control Program (flood protection)*
 - *Three Rivers Levee Improvement Authority (flood protection)Yuba County IRWMP (integrated water management)*
- *Drought Preparedness*
 - *Lower Yuba River Accord (water supply reliability, instream flows, conjunctive use)*
- *Environmental Stewardship*
 - *Lower Yuba River Accord (water supply reliability, instream flows, conjunctive use)*
- *Protect Surface Water Quality:*
 - *Lower Yuba River Accord (water supply reliability, instream flows, conjunctive use)*
- *Integrated Flood Management:*
 - *Yuba-Feather Supplemental Flood Control Program (flood protection)*
 - *Three Rivers Levee Improvement Authority (flood protection)Yuba County IRWMP (integrated water management)*
- *Protect Groundwater Quality:*
 - *Groundwater Management Plan (groundwater management, conjunctive use)*

Because these are all existing programs, they would be revisited as part of the Task 4.2 –Review and Update Integrated Management Strategies. More emphasis was placed on the Program Preferences that needed additional work as part of the Plan Update which included:

- *Regional Programs or Projects,*
- *Effectively Integrate Water Management with Land Use Planning, and*
- *Climate Change*

Geographic Balance - Not Applicable